

**From:** [Kelsey Heilman](#)  
**To:** [Simon, Dan](#); [Carlene Rios](#); [Ed Johnson](#); [Brannon, Jackson](#); [Melanie Maldonado](#); [Ped, Thomas](#); [Cartier, Norah](#); [Tiland, Brenda](#); [Omier, Michael](#); [MariRuth Petzing](#)  
**Bcc:** [21-0264374@olc.legalserver.org](mailto:21-0264374@olc.legalserver.org)  
**Subject:** supplemental RFP to PPB defendants  
**Date:** Thursday, September 29, 2022 4:08:00 PM  
**Attachments:** [2022.09.29 RFP-PPB Defendants.docx](#)  
[image002.png](#)

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Good afternoon, Dan,

Attached please find a second RFP directed to the PPB defendants in *Lovato v. Delta Hospitality Group*, 3:22-cv-00264-SB.

Also, as a heads up, we are considering seeking leave to amend the complaint to add a *Monell* claim against the Portland Police Bureau. We are going to wait until after all depositions close to make a decision so we can seek leave for a single amendment, if one is warranted. We will, of course (and as required), confer with you before we file any motion.

Kelsey



Kelsey McCowan Heilman, she/her/ella  
Senior Staff Attorney  
Portland Regional Office  
522 SW Fifth Avenue, Suite 812  
Portland, OR 97204  
503.473.8324 (p)  
503.295.0676 (f)  
[kheilman@oregonlawcenter.org](mailto:kheilman@oregonlawcenter.org)